CRIMINAL COMPLAINT

United States District Court	DISTRICT of ARIZONA
United States of America	DOCKET NO.
v. Timothy Mikell Schultheis aka Jackson Oden DOB: 1998, United States Citizen	
	MAGISTRATE'S CASE NO.
	22-04394MJ

Complaint for violation of Title 18, United States Code § 2423(a)

## COMPLAINANT'S STATEMENT OF FACTS CONSTITUTING THE OFFENSE OR VIOLATION:

On or about March 20, 2022, at or near Safford, in the District of Arizona, the defendant, Timothy Mikell Schultheis, aka Jackson Oden, did knowingly transport an individual who had not attained the age of 18 years in interstate commerce for the purpose of engaging in sexual activity for which any person can be charged with a criminal offense, to wit: Timothy Mikell Schultheis did knowingly transport Jane Doe, a 12 year-old minor, from the state of Arizona to the state of South Carolina, with intent to engage in sexual activity that would constitute a criminal offense under Title 18, United States Code, Sections 2241(c) and 2246 if the sexual act occurred in the special maritime and territorial jurisdiction of the United States; all in violation of Title 18, United States Code, Section 2423(a).

## BASIS OF COMPLAINANT'S CHARGE AGAINST THE ACCUSED:

During the evening of March 20, 2022, a man reported that his 12-year-old daughter (hereinafter Jane Doe) was missing after she had gone for a walk at approximately 11:00 a.m. near their residence in Safford and did not return home. The minor had not had any contact with her parents since leaving the residence. A tablet belonging to Jane Doe revealed several social media accounts used by the child. Information obtained from the child's Facebook account revealed communication between the child and Timothy Mikell Schultheis, aka Jackson Oden. The communications revealed a plan for Schultheis to travel from South Carolina and meet with the child. Law enforcement investigation revealed that a vehicle with South Carolina plates registered to and known to be used by Schultheis had been observed in Texas westbound on Interstate 10 at approximately 6:01 a.m. MST on March 20, 2022, and again eastbound in Texas on Interstate 10 at approximately 19:59 p.m. CST. Schultheis was arrested at his apartment in South Carolina on the morning of March 30, 2022, and Jane Doe was found in the apartment. Jane Doe stated that she met Schultheis online, and that he had traveled to Arizona, picked her up, and took her to South Carolina. The communication between Jane Doe and Schultheis within the minor's social media revealed the nature of the relationship was sexual and that he had planned to participate in sexual intercourse and other sexual acts and contact with Jane Doe as defined in 18 U.S.C. Section 2246.

MATERIAL WITNESS(ES) IN RELATION TO THE CHARGE:

DETENTION REQUESTED
COMPLAINT REVIEWED by AUSA Raquel Arellano Australiano Au